OPERATING STATUS

AB Abandoned.

Use AB for units at which the owner or operator is unwilling/unable to accept legal responsibility to close the unit.

BC Before Construction.

Use BC for proposed "new" units for which Parts A and B of the permit application have been received. In most cases BC represents the "grassy field" scenario where no ground has been broken.

CA Referred to Corrective Action for Closure.

Use CA to designate regulated units for which closure requirements have been replaced by site-specific requirements developed for corrective action under the authority of section 264.110(c) or 265.110(d).

CC Clean Closed.

Use CC to designate a unit that has completed clean closure. Closure is completed when <u>all</u> closure activities have occurred, and closure has been verified. This usually includes closure certification (sections 264.115 and 265.115), inspection of the unit to verify that the closure was conducted in accordance with the approved closure plan, and release of the owner or operator from financial assurance (sections 264.143(i) and 265.143(h)).

CN Constructed, Not Yet Managing Hazardous Waste.

Use CN for existing units entering the "RCRA process pipeline," but are not yet managing hazardous waste. For example: Newly-permitted units that have completed construction but have not yet begun managing hazardous waste; units that have managed only non-RCRA waste but are pursuing RCRA permits to manage hazardous waste; units that are clean closed and then upgraded to resume management of RCRA-regulated hazardous waste.

CO Completed Post-Closure Care.

Use CO to indicate that the post-closure care period at the unit has been completed.

CP Closed With Waste in Place.

Use CP to designate a unit that has completed closure with waste-in-place. Closure is completed when <u>all</u> closure activities have occurred, and closure has been verified. This usually includes closure certification (sections 264.115 and 265.115), inspection of the unit to verify that the closure was conducted in accordance with the approved closure plan, and release of the owner or operator from financial assurance (sections 264.143(i) and 265.143(h)).

CR Conducting Activities not Requiring a Permit.

Use CR to designate former TSD units that conduct only activities not subject to permitting. CR should be limited, however, to units that had no legal requirement to close.

CV Converted but Not RCRA Closed.

Use CV to designate units that converted to hazardous waste activities that do not require a permit (e.g., less than 90-day storage, totally enclosed treatment) <u>but</u> were required to clean close and did not.

DC Delay of Closure.

Use DC to designate landfill, land treatment, or surface impoundment units that have received the final volume of hazardous waste but, rather than begin closure, will continue to operate to receive non-hazardous waste under the authority of the "delay of closure" provisions of sections 264.113(d) and (e) or 265.113(d) and (e).

IN Inactive/Closing, but not Yet RCRA closed.

Use IN to identify units that are subject to RCRA closure requirements, and have received the final volume of hazardous waste, but have not completed closure activities as required to be designated CC or CP. Units with a legal status of NN should be assigned an operating status of IN if the unit will close.

OP Operating, Actively Managing RCRA-Regulated Waste.

Use OP to designate active units that are conducting hazardous waste management activities subject to permitting. OP should be used regardless of the current legal status of the unit. For example, OP should be used to designate units that are: Operating under interim status or pre-mod authorization; operating under permits; allowed to continue operation under enforcement orders, or interim status compliance letters; under temporary suspension of hazardous waste activities pending decision to allow operation (e.g., awaiting permit issuance) where the intent is to operate, rather than close, the unit.

A unit with a legal status of NN should be assigned an operating status of OP if: The unit is allowed to continue to operate, or; the unit temporarily ceases to operate while seeking an operating permit but there is no intent to close the unit.

PF Protective Filer.

Use PF to designate units that were submitted on a Part A, but are not RCRA-regulated, or do not exist physically.

SF Referred to CERCLA.

Use SF to designate units (AB or other) that have been referred to CERCLA for cleanup.

UC Under Construction.

Use UC to designate a new unit that has received an operating permit and begun construction, but has not yet started managing hazardous waste, or a unit that is "under construction" as defined in the section 260.10 definition of "existing hazardous waste management facility."